



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

April 20, 2015

Mr. Marcus Beard
District Ranger
U.S. Department of Agriculture Forest Service
57 Taff Drive
Crawfordville, Florida 32327

Subject: EPA Comments on the Draft Environmental Impact Statement (DEIS) for the Beasley Pond Analysis Area, Apalachicola National Forest, Liberty County, Florida. CEQ No.: 20150056

Mr. Beard:

The U.S. Environmental Protection Agency (EPA) Region 4 Office has reviewed the subject document and is providing comments in accordance with Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. The U.S. Department of Agriculture Forest Service (USFS) is proposing silvicultural treatments on approximately 3,700 acres of national forestland within Apalachicola National Forest. The USFS has identified several treatments including thinnings, uneven-aged management cuts, wet savanna restoration, woody species control, borrow pit excavation, and transportation system improvements.

The USFS evaluated 4 alternatives in the DEIS, including: Alternative A - No Action, Alternative B – Proposed Action ('preferred'), Alternative C – Reduced direct impacts on threatened and endangered species, and Alternative D – No herbicide. The Beasley Pond Analysis Area falls within Management Areas 7.1 and 7.2 and comprises compartments 24, 25, 26, 27, 28 and 29 of the national forest. Within Apalachicola National Forest, the Beasley Pond Area is located on the western, central border of the forest. EPA has provided a summary of technical review comments to this letter (See Attachment A).

In summary, EPA has rated the DEIS as 'lacks objections' (LO) for the USFS's preferred Alternative 'B'. However, EPA recommends the inclusion of some additional Best Management Practices (BMPs) for the implementation of the preferred alternative and that clarification of water quality issues to be considered and addressed in the Final Environmental Impact Statement (FEIS). Please feel free to contact Mr. Christopher Militscher of my staff at 404-562-9512 or by e-mail at Militscher.chris@epa.gov should you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Mueller', with a long horizontal flourish extending to the right.

Heinz J. Mueller, Chief
NEPA Program Office
Resource Conservation and Restoration Division

Attachment A
Technical Review Comments
Draft Environmental Impact Statement (DEIS) for the Beasley Pond Analysis Area,
Apalachicola National Forest, Liberty County, Florida
CEQ No.: 20150056

Summary of Impacts

The DEIS includes a comparison of alternatives on Page 43 and the preferred Alternative B includes: 2,068 acres of thinning slash pine and longleaf pine, 16 acres of borrow pit excavation, 833 acres of uneven-aged stand management techniques, 811 acres of wet savanna restoration with spot treatments of herbicide Triclopyr for hardwoods, 14.7 miles of road maintenance for timber sale, 13.3 miles of road reconstruction to haul timber and 4.0 miles of reconstruction of existing non-system roads.

Water Quality Issues

Based upon a review of the EPA's *NEPAssist* program for the Beasley Pond Analysis Area within Apalachicola National Forest, there appears to be a first-order stream (Gregory Mill Creek) that crosses the road NF-109 and shows as being impaired under Section 303(d) of the Clean Water Act. The stream is west of Central City and State Route 65. Please see: <http://nepassisttool.epa.gov/nepassist/entry.aspx>. The DEIS generally describes water quality issues on Page 49-51 and identifies Gregory Mill Creek as being the main drainage feature in the forest analysis area. However, this section of the DEIS indicates that there are no known background water quality tests that have been completed for this area. EPA requests that the U.S. Forest Service contact the Florida Department of Environmental Protection (FDEP) to confirm if this stream that appears to be located in a portion of the Beasley Pond Analysis Area is impaired. The type of impairment should be identified in FEIS and methods to prevent further degradation should be identified, as appropriate.

Best Management Practices

The DEIS identifies coordination measures for proposed, endangered, threatened and sensitive (PETS) species, heritage resources, public health and safety, soil and water, vegetation and visual quality. The coordination measures include a web reference to Florida's Silvicultural Best Management Practices (BMPs) revised 2008 manual. EPA's notes the coordination measures proposed by the U.S. Forest Service pertaining to threatened and endangered species and defers to the U.S. Fish and Wildlife Service on these issues.

The DEIS indicates that there are isolated wetlands in the project area and that timber removal activities by the USFS contractor would be allowed up to the ponds. Timber harvesting is proposed to be restricted to these areas only when it is dry enough to allow for minimum soil disturbance. EPA recommends that known ponds and wetland areas in areas to be harvested are clearly marked and flagged to reduce the potential for the timber contractor 'misjudgments'. Road construction and re-construction activities should be performed in such a manner that

streams are not impacted from potential soil erosion. EPA also recommends that the U.S. Forest Service provide further instructions to the timber contractors and/or consider the inclusion of these additional BMPs in the timber sales contract:

- Report all leaks and spills of oils and fuels to the U.S. Forest Service representative and immediately contain the spill or leak.
- If spills reach streams or wetlands, please notify the National Response Center at 1-800-424-8802.
- Remove any contaminated soils and absorbent materials for proper disposal.
- All logging trucks should be free from tire mud and debris before exiting the Apalachicola National Forest onto public roads.

EPA concurs with the other BMPs as proposed by the USFS in the DEIS, including WA-1, WA-2, et al.

Threatened and Endangered Species

EPA acknowledges the information concerning Federally-protected threatened and endangered species and critical habitat in the DEIS and the USFS's biological assessment of the potential effects to these species from implementation of the preferred alternative. EPA defers to the U.S. Fish and Wildlife Service on Section 7 of the Endangered Species Act issues.